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February 28, 2024

VIA CM/ECF

Hon. Judith C. McCarthy
United States Magistrate Judge
U.S. District Court, SDNY
The Hon. Charles L. Brieant, Jr. Federal Building
and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

RE: Jackson, et al. v ProAmpac LLC, et al./ Civil Case No.: 22-cv-3120

Dear Judge McCarthy:

We represent the Defendants in the above-referenced action and write jointly with the consent of counsel for Plaintiffs to (i) advise Your Honor that the parties have conferred and reached a resolution of the issues raised in Plaintiffs' pending motion to compel discovery [Dkt. 85], and (ii) request that the Court remove said motion from the docket. As part of this resolution, Defendants have agreed to produce time and pay records in a format discussed by the parties.

Plaintiffs have reserved the right to renew their motion to compel (or any portion thereof) should they determine that Defendants' anticipated production is materially deficient, after the parties have met and conferred over any such purported deficiency.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Vincent E. Polsinelli".

Vincent E. Polsinelli
Counsel

VEP/krd